

AO 91 Rev. 1-12 Criminal Complaint

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FILED
2/28/2023THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CASE NUMBER: 23CR116

DENNIS WILLIAMS,
also known as "Ace"**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about August 2, 2022, at Dolton, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant(s) violated:

*Code Section*Title 18, United States Code, Section
1201(a)(1)*Offense Description*


unlawfully seized, confined, kidnapped, abducted and carried away for ransom, reward, and otherwise any person, namely Victim 1, using a means, facility, and instrumentality of interstate or foreign commerce in committing and in furtherance of the kidnapping

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Scott ErthalSpecial Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: February 28, 2023 2:30PM

Judge's signatureCity and state: Chicago, IllinoisJEFFREY COLE, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, Scott Erthal, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed for four years. I am assigned to the South resident agency where I investigate violent crimes such as bank robberies, Hobbs Act violations, kidnappings, and gang investigations. Prior to working for the FBI, I was a police officer at the Jacksonville, Illinois Police department for approximately eight years where I investigated criminal violations of the laws of the State of Illinois.

2. This affidavit is submitted in support of a criminal complaint alleging that Dennis Williams, also known as "Ace", has violated Title 18, United States Code, Section 1201(a)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging WILLIAMS with kidnapping, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, on information I have received from other law enforcement personnel, on information received from persons with knowledge regarding relevant facts, and on my review of records including hotel

records, cell phone records, and financial records. Any bracketed language is an interpretation of phrases, based upon training and experience.

I. FACTS SUPPORTING PROBABLE CAUSE

A. Background of the Investigation

4. As explained below, an investigation of sex trafficking of minors and adults uncovered evidence that DENNIS WILLIAMS (also known as "Ace"), engaged in the kidnapping of Victim 1, in Dolton, Illinois, and the surrounding suburbs, on or about August 2, 2022.¹

B. Information Provided by Victim 1

5. On or about February 7 and 17, 2023, law enforcement conducted interviews of Victim 1. According to Victim 1, she worked in the commercial sex trade. She ran her business by posting advertisements on a website, megapersonals.com², that included photographs of her and her location. Victim 1 utilized hotels in Lansing, Illinois, including Hotels A and B, as locations where she engaged in commercial sex acts.

6. According to Victim 1, in or around the late spring or early summer of 2022, Victim 1 met WILLIAMS³, who she knew as "Ace", through friends while

¹ All dates and times in this affidavit are approximate.

² Based on my training and experience, megapersonals.com is a website where users can post advertisements, which can include both text and photographs. This website is commonly used to post advertisements for commercial sex acts.

³ Victim 1 identified WILLIAMS as follows: On or about February 7, 2023, after law enforcement obtained a law enforcement booking photo of WILLIAMS, an agent with no knowledge of the identity of WILLIAMS showed a photo array of six photos to Victim A, who identified the photo of WILLIAMS as the person she knew as "Ace".

attending a party at Hotel A in Lansing, Illinois. Shortly thereafter, Victim 1 and WILLIAMS began a relationship and WILLIAMS began acting as security for Victim 1 when she engaged in commercial sex, making sure that the men Victim 1 had sex with did not hurt her, rob her, or avoid paying her. At one point, Victim 1 was unable to access her account on megapersonals.com from her phone, so WILLIAMS let Victim 1 use his phone to access her account to post advertisements for commercial sex. According to Victim 1, when WILLIAMS first began acting as her security and helping her with ads, he would take a small portion of her earnings, approximately \$20 to \$40 out of \$120, and she would keep the rest.

7. According to Victim 1, after a few weeks of staying at hotels in Lansing, Illinois, WILLIAMS convinced Victim 1 to stay with him at his apartment in Altgeld Gardens, which is public housing located on the south side of Chicago, Illinois. According to Victim 1, her move to Altgeld Gardens was when WILLIAMS treatment of her began to change. WILLIAMS began controlling Victim 1's business, money, and movement.

8. According to Victim 1, WILLIAMS would not allow Victim 1 to do "outcalls." Victim 1 explained that an "outcall" is when an individual engages in commercial sex with customers at the customer's house or place the customer stays as opposed to a place dictated by Victim 1 or WILLIAMS. If Victim 1 met men for sex at the apartment in Altgeld Gardens or a hotel, WILLIAMS was usually present in a room nearby. WILLIAMS wanted Victim 1 to work all of the time. WILLIAMS would

take Victim 1's phone while she was asleep and bump⁴ her ads to the top. WILLIAMS would then book customers for Victim 1. When Victim 1 awakened, WILLIAMS would inform her that she had to go to work even if she was tired or did not want to.

9. According to Victim 1, WILLIAMS also monitored her phone at night to see who she was talking to and to confirm that she was not turning down any customers. One time, WILLIAMS took Victim 1's phone and saw that I had been talking to Individual C, her current boyfriend who previously acted as her security. WILLIAMS became angry and attacked Victim 1, choking her until she could no longer breathe, with WILLIAMS telling her that "[she] was with him now, and to call him daddy". Victim 1 understood him to mean that he was her pimp and she belonged to him.

10. According to Victim 1, WILLIAMS also began controlling her money. Instead of collecting a small portion of her earnings, when a customer paid Victim 1, she would hand WILLIAMS all of her earnings. WILLIAMS then used Victim 1's money like his own. WILLIAMS provided Victim 1 with food, clothes, and drugs, but did not allow Victim 1 to control her own money. If Victim 1 needed anything, she had to go through WILLIAMS.

11. According to Victim 1, WILLIAMS knew that Victim 1 liked to use cocaine and marijuana to make her feel ready for dates. After dates, WILLIAMS would give Victim 1 more drugs so that she would keep working "back-to-back-to-

⁴ Based on my training and experience, I know that megapersonals.com offers an option to the individual who posted an ad to press "bump", which causes the ad to move to the top of the page for increased visibility.

back", even when tired or when she did not want to work. He called Victim 1 "his money," and he would threaten Victim 1 "not to mess up his money or else", which she understood him to mean that she could not say no.

12. According to Victim 1, WILLIAMS sometimes used the money she earned to purchase drugs, including heroin, cocaine, and marijuana, that he could sell. For example, one time, he took the money that Victim 1 earned and used it re-up his stash of drugs that he was going to sell. WILLIAMS showed Victim 1 the drugs he bought and said, "look what you did," which she understood to mean that he used the money Victim 1 earned to purchase drugs. WILLIAMS did not give Victim 1 the proceeds from the drugs he sold that had been purchased with her earnings.

13. According to Victim 1, WILLIAMS also controlled her movement. Victim 1 wanted to leave WILLIAMS, but she could not because he did not allow Victim 1 to be alone. For example, WILLIAMS required Victim 1 to join him on errands, only let her be alone when on dates or if WILLIAMS had court, and denied her access to her friends. When WILLIAMS and Victim 1 stayed at hotels, he would ensure Victim 1 could not escape by placing a chair against the door so that WILLIAMS would hear if Victim 1 tried to leave the room. Victim 1 recalled that one time at a hotel, she began to pack and WILLIAMS said something like "did I tell you we were going somewhere?"

14. According to Victim 1, in June or July of 2022, Individual C got out of jail and contacted Victim 1 while she was at a hotel. Victim 1 was able to gather some of her belongings and went to a different hotel room with a friend, ultimately fleeing

the hotel with Individual C. Because she had been at the hotel when she decided to leave, she left behind many of her belongings at the apartment in Altgeld Gardens, including her state identification card.

C. WILLIAMS Kidnaps Victim 1 on August 2, 2022

15. According to Victim 1, on or before August 2, 2022, she received a COVID stimulus check⁵ and needed her ID in order to cash the check. Because it was too late in the day to get a new ID as the Secretary of State office was closed, Victim 1, who was without a phone at the time, contacted WILLIAMS via speakerphone on Individual B's cell phone, Individual B is Victim 1's sibling. Individual B was present for the phone call which took place via speaker phone. According to Victim 1, she told WILLIAMS she needed her ID and he first responded that Victim 1's "ID was at another place". Victim 1 then called him on speakerphone with Individual B several additional times. During the last call, WILLIAMS said he had Victim 1's ID and asked her to meet him behind a restaurant located on the 1300 block of Sibley in Dolton, Illinois.⁶ Victim 1 asked Individual B to come with her because she was afraid that

⁵ According to Victim 1, the day after the incident described herein, she applied for a new ID and went to a Walmart located on the 17500 block of South Halsted in Homewood, Illinois to cash the COVID stimulus check, which was approximately \$1,800. According to Illinois Secretary of State records, Victim 1 applied for a new ID on August 3, 2022. According to Walmart records, on or about August 3, 2022, there was a check cashed at the Homewood Walmart in the amount of \$1,876.49, which was the only check in an amount close to \$1,800 cashed that day. The Walmart records do not indicate who cashed the check or provide additional information about the check.

⁶ According to screenshots taken of the call log on Individual B's phone, beginning at approximately 8:15 p.m. through 9:05 p.m., there were a total of 13 outgoing calls lasting between 1 and 2 minutes each made to (708) XXX-3794 ("Williams Phone"). At approximately 9:08 p.m. there was an outgoing call made to Williams Phone that lasted approximately 10 minutes. At approximately 9:18 p.m. there was an outgoing call made to Williams Phone that lasted approximately 1 minute.

WILLIAMS might try to take her and beat her. Victim 1 explained to Individual B that she was afraid because she had witnessed WILLIAMS beat other girls.

16. According to Victim 1, Individual B drove her to the location and parked on the street next to WILLIAMS facing in the opposite direction. WILLIAMS was driving a red Chevy Silverado that Victim 1 recognized as belonging to a friend of hers, Individual A. Individual B stayed in his/her car while Victim 1 approached WILLIAMS. WILLIAMS told Victim 1 to get in the truck and explained that he wanted to talk to Victim 1 and that he had narcotics for her. WILLIAMS showed Victim 1 the baggie of narcotics that contained multiple hits of what appeared to Victim 1 to be cocaine. WILLIAMS told Victim 1 if she entered the Chevy Silverado, he would give her back her ID.

17. According to Victim 1, she eventually got in the vehicle, at which point WILLIAMS took off at a high rate of speed and locked the doors. Victim 1 began to panic and yelled at WILLIAMS that she wanted him to stop the vehicle and provide her with her ID. WILLIAMS did not stop the vehicle when she asked. WILLIAMS told her he was taking her somewhere to get her ID and continued to drive at a high rate of speed in what Victim 1 observed to be a pattern designed to evade anyone

Law enforcement identified WILLIAMS as the user of the Williams Phone as follows: (1) In or around January 2022, WILLIAMS provided the Williams Phone as his number following a traffic stop; (2) On or about November 22, 2022, law enforcement conducted an interview of an individual who identified WILLIAMS and provided the contact information for WILLIAMS as the Williams Phone; and (3) On or about February 3, 2022, law enforcement officers arrested WILLIAMS in connection with a state arrest warrant for damage to property. Leading up to the arrest and at the time of the arrest, WILLIAMS was on the phone with law enforcement using the Williams Phone.

following the vehicle. Afraid of what WILLIAMS might do or where he might take her, Victim 1 managed to unlock the door and struggled free from WILLIAMS, who at that point was holding onto her arm and thigh to prevent her from exiting the vehicle. Victim 1 fell from the vehicle onto the pavement in an alley and started to roll from the impact. She suffered road rash, lacerations, and large bump on her head. After jumping from the vehicle, Victim 1 observed WILLIAMS driving the vehicle in her direction, so she took off running through backyards and hid under a trampoline until he drove past. Victim 1 then saw Individual B's vehicle and got in the car. According to Victim 1, after she got in the car, she told Individual B, "he was going to kill me".

D. Information from 911 Records and the Dolton Police Department

18. According to 911 records, Individual B placed a recorded call to 911 in order to report what had happened to Victim 1.⁷ During the call, Individual B told the operator her location and stated, "this man just kidnapped my sister, she just had to jump out of the car, he beat on her..." Individual B further explained that he/she was following the Chevy Silverado, described the vehicle as a red truck, and provided temporary license plate number R216627.⁸ Individual B further provided that the person driving the Chevy Silverado was "Dennis".

⁷ According to the call log on Individual B's phone, which Individual B shared with law enforcement, Individual B's call to 911 was initially placed at approximately 9:21 p.m.

⁸ According to Indiana Secretary of State Records, the Chevy Silverado bearing temporary license plate R216627 was registered to Individual A on the 2900 block of Crabapple Lane, Hobart, Indiana.

19. On August 2, 2022, both Victim 1 and Individual B went to the Dolton Police Department and reported the incident. According to the Dolton Police Department report, Victim 1 stated that she met up with an ex-boyfriend, identified as Dennis, to recover her ID. When she got in the vehicle, the two had a verbal altercation and Dennis took off at a high rate of speed. To get away from Dennis, Victim 1 jumped out of the vehicle sustaining visible injuries. The police department contacted an ambulance. According to ambulance records, Victim 1 reported that she "jumped from a moving car that was kidnapping her". Emergency medical technicians assessed Victim 1's injuries, noting "obvious areas of superficial injury to the forehead, torso, left flank, bilateral lower extremities, bilateral upper extremities [w]ounds resemble road rash, most areas are weeping fresh blood."

E. Information from Individual B

20. On or about February 7 and 17th, 2023, law enforcement interviewed Individual B. During the interview, Individual B told law enforcement that on or about August 2, 2022, he/she travelled to where Victim 1 was living with one of their other siblings in Harvey, Illinois to deliver a check to Victim 1. Victim 1 advised that she did not have her ID, because she had left it with her former boyfriend. Individual B allowed Victim 1 to use his/her phone to contact the former boyfriend. According to Individual B, it took awhile for the boyfriend to agree on a pickup location. When he finally agreed, Individual B drove to a location in Dolton, Illinois and met up with a man driving a red truck. Victim 1 got out of Individual B's car and walked over to the red truck Individual B observed Victim 1 and the man arguing before Victim 1

got into the red truck. Shortly thereafter, the red truck took off at a high rate of speed. Individual B attempted to follow the red truck, but due to the speed and the many turns the red truck took down streets and alleys, Individual B could not keep up. Eventually, Individual B heard Victim 1 scream and saw her jump over a fence from an alley to a main road where Individual B was parked.

F. Information from Individual A

21. On or about February 23, 2023, law enforcement interviewed the registered owner of the Chevy Silverado, Individual A, who stated that on or about August 2, 2022, he and a female friend purchased narcotics at a hotel located on the 17300 block of Oak Avenue in Lansing, Illinois ("Hotel A") from WILLIAMS⁹, who Individual A knew as Ace. While Individual A used the drugs, WILLIAMS asked Individual A if he could use Individual A's Chevy Silverado. Individual A agreed and provided WILLIAMS with his keys. WILLIAMS stated he would pay Individual A when he returned with the Chevy Silverado. According to Individual A, WILLIAMS did not return the Chevy Silverado that day. According to Individual A, several days later, Individual A learned that a friend observed the Chevy Silverado at Hotel A. Individual A attempted to confront WILLIAMS, but WILLIAMS ran away. Individual A then reported the Chevy Silverado as stolen.¹⁰ Law enforcement located

⁹ Individual A identified WILLIAMS as the individual he knew as "Ace" after picking him out of a photo array of six individuals.

¹⁰ According to a Lansing Police Department report, Individual A reported the Chevy Silverado stolen on August 2, 2022. Individual A told the police that an unknown black male stole his vehicle, whose identity he denied knowing. According to a second Lansing Police Department report, law enforcement officers located the Chevy Silverado at Hotel A. At that time, Individual A told law enforcement that "Dennis" was the individual who had stolen the

the Chevy Silverado and had the vehicle towed as Individual A did not have the keys. When Individual A attempted to recover the keys, WILLIAMS agreed to return the keys only if Individual A paid him \$100. Individual A decided to "let it go".

22. During the interview, Individual A noted that he knew Victim 1 and that at some point after his truck was stolen by WILLIAMS, he received photos of Victim 1. The images depict Victim 1 in a hospital bed with dried blood on her forehead and road rash on her hand and arms. Individual A provided law enforcement with the images.

G. The Chevy Silverado Was Manufactured Outside of Illinois

23. Based on an interview with a Chevrolet employee familiar with the manufacturing locations of Chevy Silverados in the year that Individual A's was manufactured, Individual A's Chevy Silverado was manufactured outside of Illinois.

vehicle and provided law enforcement with the Williams Phone as the contact number for WILLIAMS.

II. CONCLUSION

24. Based on the above information, I respectfully submit that there is probable cause to believe that WILLIAMS has committed the offense of kidnapping, in violation of Title 18, United States Code, Section 1201(a)(1).

FURTHER AFFIANT SAYETH NOT.



SCOTT ERTHAL

Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on February 28, 2023.



Honorable JEFFREY COLE

United States Magistrate Judge